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5 *Attorneys for Defendants*  
*VINTAGE, INC. dba VINTAGE POOLS and*  
6 *SARAH JACKSON*

7  
8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 PHILADELPHIA INDEMNITY  
11 INSURANCE COMPANY,

12 Plaintiff,

13 vs.

14 VINTAGE, INC. dba VINTAGE POOLS;  
SARAH JACKSON; and DOES 1 through  
15 X, and ROE CORPORATIONS, 1 through  
X, inclusive,

16 Defendants.  
17

CASE NO. 2:24-cv-1828

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR  
DEFENDANTS VINTAGE, INC. dba  
VINTAGE POOLS and SARAH  
JACKSON TO FILE RESPONSE TO  
PLAINTIFF'S MOTION FOR  
PRELIMINARY INJUNCTION (ECF #3)  
AND TEMPORARY RESTRAINING  
ORDER (ECF #4)**

**(FIRST REQUEST)**

18  
19 COMES NOW, Defendants VINTAGE, INC. dba VINTAGE POOLS and SARAH  
20 JACKSON("Defendants") by and through their counsel of record, John Henry Wright, Esq., of  
21 The Wright Law Group, P.C., and Plaintiff PHILADELPHIA INDEMNITY INSURANCE  
22 COMPANY("PIIC") by and through its attorney, Kurt C. Faux, Esq., of The Faux Law Group, and  
23 hereby stipulate and agree as follows:

24 PIIC filed its Complaint (ECF # 1), Motion for Preliminary Injunction (ECF #3) and  
25 Temporary Restraining Order (ECF #4) on September 30, 2024. On October 8, 2024 Defendants  
26 were served with the Summons and Complaint (ECF # 9). The Defendants have failed to appear,  
27 file an answer to the Complaint or oppose the motions. On November 26, 2024 the Court issued  
28 a Minute Order (ECF #10) directing the Defendants to file their response to Plaintiff's Motion for

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Preliminary Injunction (ECF #3) and Temporary Restraining Order (ECF #4) by December 10, 2024.

The parties are currently negotiating and the underlying state lawsuit has been settled pending finalization of the settlement agreement currently with counsel for plaintiff in the underlying state case and Mr. Faux. Therefore the parties have agreed to extend the current deadline to oppose Plaintiff's Motion for Preliminary Injunction (ECF #3) and Temporary Restraining Order (ECF #4) by thirty days along with a continuation of the deadline set by the Court in its November 26, 2024 Minute Order.

**IT IS HEREBY AGREED AND STIPULATED**, that the deadline for Defendants to file a response to Plaintiff's Motion for Preliminary Injunction (ECF #3) and Temporary Restraining Order (ECF #4) shall be extended until January 9, 2025.

The parties have entered into the agreement and good faith and not for any improper purpose or delay. This is the parties' first request for an extension.

Dated this 9<sup>th</sup> day of December, 2024.

**THE FAUX LAW GROUP**

/s/ Kurt C. Faux, Esq.

Kurt C. Faux, Esq.  
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*Attorneys for Plaintiff PHILADELPHIA  
INDEMNITY INSURANCE COMPANY*

Dated this 9<sup>th</sup> day of December, 2024.

**THE WRIGHT LAW GROUP, P.C.**

/s/ John Henry Wright, Esq.

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*Attorneys for Defendants  
VINTAGE, INC. dba VINTAGE POOLS and  
SARAH JACKSON*

**IT IS SO ORDERED.**



**RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE**

**DATED:** This 9th day of December, 2024.

